

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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THE ABI JAOUDI AND AZAR  
TRADING CORP.,

Plaintiff,

v.

CIGNA WORLDWIDE INS. CO., et al.,

Defendants.

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**NOTICE OF SUPPLEMENTAL AUTHORITY OF NON-PARTY  
RESPONDENTS MARTIN KENNEY AND JOSEPH H. LILLY, III.**

On April 17, 2013, Non-Party Respondents MARTIN KENNEY and JOSEPH H. LILLY, III became aware of the following authority relevant to the motions currently before the court.

On April 17, 2013, the United States Supreme Court issued its opinion in *Kiobel v. Royal Dutch Petroleum Co.*, \_\_\_\_ U.S. \_\_\_\_, 2013 WL 1628935 (copy attached as Exhibit 1). The case reaffirms the rule announced in *Morrison v. National Australia Bank, Ltd.*, 561 U.S. \_\_\_\_, 130 S.Ct. 2869 (2010), that the laws of the United States do not apply to actions taken by foreign nationals in foreign countries absent Congress so stating in the law. *Kiobel*, Slip op. at 4. It also reaffirms the “presumption that United States law governs domestically but does not rule the world.” *Id.*

In their briefs filed on April 15, 2013 (Dkt. Nos. 375 and 376), Non-Party Respondents Martin Kenney and Joseph Lilly cited and relied upon *Morrison* for the point that the laws and rules relating to criminal or civil contempt do not apply extraterritorially. They hereby cite the *Kiobel* opinion as additional authority.

Respectfully submitted,

/s/ Robert C. Clothier

Robert C. Clothier (Attorney ID #57162)  
Rochelle D. Laws (Attorney ID #206381)  
FOX ROTHSCHILD LLP  
2000 Market Street, 20th Floor  
Philadelphia, PA 19103  
(215) 299-2000 (Phone)  
(215) 299-2150 (Fax)

and

Gary M. Miller (admitted *pro hac vice*)  
Donald A. Vogelsang (admitted *pro hac vice*)  
Matthew C. Wolfe (admitted *pro hac vice*)  
GRIPPO & ELDEN LLC  
111 S. Wacker Drive, Suite 5100  
Chicago, IL 60606  
(312) 704-7700 (Phone)  
(312) 558-1195 (Fax)

Attorneys for Non-Party Respondents,  
MARTIN KENNEY and JOSEPH H.  
LILLY, III

Dated: April 18, 2013

**CERTIFICATE OF SERVICE**

I hereby certify, that on this date a true and correct copy of the foregoing Notice Of Supplemental Authority Of Non-Party Respondents Martin Kenney And Joseph H. Lilly, III, was served via the Court's ECF filing system (unless otherwise stated) upon the parties listed on the attached service list:

Donald W. Hawthorne, Esquire  
AXINN VELTROP HARKRIDER LLP  
114 West 47<sup>th</sup> Street  
New York, NY 10036

Donald Francis Donovan, Esquire  
DEBEVOISE & PLIMPTON LLP  
919 Third Avenue  
New York, NY 10022

Stephen A. Cozen, Esquire  
Richard J. Bortnick, Esquire  
COZEN O'CONNOR  
1900 Market Street  
Philadelphia, PA 19103  
*Attorneys for Defendant, CIGNA  
Worldwide Insurance Company*

Derek T. Ho, Esquire  
KELLOGG, HUBER, HANSEN, TODD,  
EVANS & FIGEL P.L.L.C.  
Sumner Square  
1615 M Street, N.W., Suite 400  
Washington, DC 20036  
*(Via E-Mail)*

Joseph A. Tate, Esquire  
DECHERT LLP  
Cira Centre  
2929 Arch Street  
Philadelphia, PA 19104-2808  
*(Via E-Mail)*  
*Attorneys for Non-Party Respondents,  
ECHEMUS GROUP L.P., ECHEMUS INVESTMENT  
MANAGEMENT LTD., EF (US) LLC, AND JAMES  
LITTLE*

/s/ Rochelle D. Laws  
ROCHELLE D. LAWS

Dated: April 18, 2013